

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	
	)	Case No. 24-mj-8080-PGL
JOHN REARDON,	)	
	)	
Defendant	)	

**UNITED STATES' SUPPLEMENTAL STATEMENT**  
**IN SUPPORT OF ITS MOTION FOR DETENTION**

Following the January 31, 2024 hearing on probable cause and detention in this matter, the United States hereby submits the following supplemental statement regarding detention. At the hearing, the Court asked the defendant to work with the probation officer to draft proposed conditions of release and asked the government to weigh in on the proposed conditions.

It is the government's position that the only conditions that could reasonably assure the safety of community and the defendant's compliance with court orders are home confinement with no ability to leave and no use of a phone or the internet. The defendant's alleged threats included not just threats to bomb Jewish houses of worship, but threats to kill and harm Jewish people, including Jewish children. If the defendant is released on conditions that permit him to leave his residence, the defendant could encounter a Jewish person in the community the moment he steps out the door, and therefore strict home confinement is necessary to reasonably assure the safety of people in the community.

Additionally, it is the government's position that home confinement, alone, would not be sufficient to reasonably assure the safety of members of the community, given that the defendant need only be able to possess a cellular phone or landline in order to accomplish the type of harm that he is charged with causing. The government acknowledges that imposing such a strict

condition of home confinement and forbidding any use of a phone or internet is not practicable, and therefore maintains its position that detention is necessary.

Finally, jails are obligated to provide medical and mental health treatment to pre-trial detainees. If the defendant needs such treatment, he will receive those services in pretrial detention.

For the reasons the government provided at the detention and probable cause hearing on January 31, 2024, and the reasons set forth above, the United States respectfully requests that the Court detain this defendant.

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

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Dated: February 2, 2024

#### CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Torey B. Cummings  
Torey B. Cummings  
Assistant United States Attorney

Dated: February 2, 2024